

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHARLES M. BUTLER, III and
CHOLE BUTLER,

Plaintiffs,

v.

UNIFIED LIFE INSURANCE COMPANY,
HEALTH PLANS INTERMEDIARIES
HOLDINGS, LLC, D/B/A HEALTH
INSURANCE INNOVATIONS, HEALTH
INSURANCE INNOVATIONS, INC.,
ALLIED NATIONAL, INC., NATIONAL
BROKERS OF AMERICA, INC., THE
NATIONAL CONGRESS OF EMPLOYERS,
INC., and DOES 1-10,

Defendants.

Cause No. _____

PLAINTIFF'S MOTION TO ENFORCE SUBPOENA

Plaintiffs, Charles M. Butler III and Chole Butler, by and through undersigned counsel, hereby move for an order compelling Defendant National Brokers of America, Inc. to respond to Plaintiffs' subpoena to produce documents in compliance with Federal Rule of Civil Procedure 45. In support of this Motion, Plaintiffs hereby incorporate by reference, as if fully set forth herein, the accompanying memorandum of law and exhibits. A proposed form of order is also included.

Respectfully submitted,

/s/ Benjamin E. Gordon

Benjamin E. Gordon (Pa. ID No. 311741)
STRADLEY RONON STEVENS & YOUNG, LLP
2005 Market Street, Suite 2600
Philadelphia, PA 19103
T: (215) 564-8000
F: (215) 564-8120
E: bgordon@stradley.com

- and -

John Morrison, Esq. (*of counsel*)
MORRISON SHERWOOD
WILSON DEOLA PLLP
401 North Last Chance Gulch, P.O. Box 557
Helena, Montana 59624
T: (406) 442-3261
F: (406) 443-7294
E: john@mswdlaw.com

*Attorneys for Plaintiffs,
Charles M. Butler, III and Chole Butler*

Dated: January 7, 2019